

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JULIAN SANCTON, individually and on  
behalf of others similarly situated,

Plaintiffs,

Case No. 1:23-cv-10211-SHS

v.

OPENAI, INC., OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, OPENAI  
HOLDINGS, LLC, and MICROSOFT  
CORPORATION,

Defendants.

**NOTICE OF MOTION TO ADMIT COUNSEL *PRO HAC VICE***

Pursuant to Rule 1.3 (c) of the Local Rules of the United States District Courts for Southern and Eastern Districts of New York, Annette L. Hurst hereby moves this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Defendant Microsoft Corporation in the above-captioned actions.

I am a member in good standing of the Bar of the State of California and there are no pending disciplinary proceedings against me in any state or federal court. I have never been convicted of a felony. I have never been censured, suspended, disbarred or denied admission or readmission by any court. I have attached an affidavit pursuant to Local Rule 1.3.

Dated: December 18, 2023

By: /s/ Annette L. Hurst

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